



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

April 19, 2017

**BY ECF**

The Honorable Laura Taylor Swain  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. John Edward Taylor, 17 Cr. 1 (LTS)***

Dear Judge Swain:

We write to request an adjournment of approximately 30 days, so that the parties can continue negotiating the terms of a disposition in this case.

By way of background, on January 12, 2017, the parties appeared before the Court for an initial pretrial conference. On that date, the Court set a schedule for the Government to provide discovery and set a follow-up pretrial conference for March 16, 2017. On March 13, 2017, counsel for the defendant filed a letter with the Court requesting an adjournment of approximately 30 days to allow defense counsel additional time to review discovery and for the parties to engage in plea discussions, which had just commenced. On the same date, the Court granted the defendant's request, ordering the case adjourned to April 20, 2017 (the "March 13 Order").

Since the March 13 Order, the parties have continued to engage in plea negotiations. The negotiations have not been completed, but the parties plan to continue our discussions, and anticipate an agreed-upon disposition in the near future. However, the parties do not anticipate a resolution before the April 20, 2017 pretrial conference. Accordingly, the parties jointly write to request an adjournment of approximately 30 days, to continue the foregoing discussions in hopes of reaching a disposition of this matter.

To the extent the Court is inclined to grant the parties' request for an adjournment, the Government also respectfully requests, pursuant to 18 U.S.C. § 3161(h)(7)(A), in light of ongoing plea discussions and in the interest of justice, that the Court exclude time under the Speedy Trial

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Act until the new pretrial conference date. Mr. Taylor, though his counsel, consents to this request.

Respectfully submitted,

JOON H. KIM

Acting United States Attorney

By: \_\_\_\_\_/s/\_\_\_\_\_

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cc: Julia Gatto, Esq (by ECF and e-mail)